As one who lives in the San Juan's, I urge that a cumulative assessment scope the possibility of marine accidents and resulting environmental and economic/jobs impacts as ship transits increase in the San Juan's due to the increased coal tanker traffic resulting from the proposed Gateway Pacific terminal.

In the decade ending in 2005, there were 1,462 accidents and 1,159 incidents reported, according to T. Hass in "The Vessel Traffic Risk Assessment for BP Cherry Point and Maritime Risk Management in Puget Sound." Currently, there are about 11,000 large vessels and oil barges going through the San Juan's, including 1,322 oil tankers, each of which carries an average of 30 to 40 million gallons of crude oil.

The proposed traffic from the Gateway terminal will add about 440 ship transits annually at the onset and 950 transits per year at least within a few years (see Alexander Gillespie, "Scoping Suggestions for the Risk of Accidents Associated with Vessel Traffic" cited in this comment.)

I urge you to evaluate the cumulative impacts on vessel impacts from not only the Gateway project, but all of the various port expansion projects through the Salish Sea. If all five of the proposed terminals do go forward, the volume of ship traffic through our Northwest waters would roughly double.

The public repeatedly is reassured by the corporations involved in shipping oil and coal that the possibility of a serious accident/spill is minimal. Yet our experience proves otherwise. The BP *Deepwater Horizon* disaster in the Gulf and the *Exxon Valdez* accident in Alaska suggest catastrophic spills are a very real part of the fabric of the energy industry that earns huge profits each year.

It's instructive to look at less well-known oil spills in the areas through which the coal tanker traffic will travel. The *Arco Anchorage* in 1985 spilled 239,000 gallons of crude oil off the Strait of Juan de Fuca. Three years later, the barge *Nestucca* spilled 231,000 gallons of crude oil in the waters near Grays Harbor. In 1991, cargo ship *Tuo Hai* collided with a fishing vessel spilling 400,000 gallons of heavy oil outside the entrance of the Strait of Juan de Fuca. About 277,000 gallons were spilled into Whatcom Creek in Bellingham after an explosion at the Olympic Pipeline that killed three people. A Foss barge spilled about 4,700 gallons at Point Wells in 2003. The next year, an oil tanker owned by Conoco Phillips called *Polar Texas* spilled 7,200 gallons of ANS Crude oil during an attempted introduction of ballast water into its oil tanks. (see Gillespie, p. 3).

The Washington Department of Ecology and the Puget Sound Partnership in a 2011 report cited an earlier study (2004) that concluded a major oil spill could cost Washington's economy 165,000 jobs and some $10.8 billion. These figures now appear to be far too low. As part of the scoping, the issue of what the costs would be of major and minor oil spills in the Salish Sea should be addressed. In addition, the issue of who would bear these costs must be addressed. With both the *Exxon Valdez* and the BP *Deepwater Horizon* disasters, very large oil companies did bear

some of the costs. In the case of the Gateway terminal, the coal tankers are likely to be registered in places such as Panama and Liberia and are unlikely to have the deep pockets of Exxon or BP to foot some of the bill of an oil spill disaster in the Salish Sea. Would Peabody Coal be required to pay for a marine disaster? Would SSA Marine? Would Goldman Sachs?

Hopefully, your scoping will determine what the burden would be on Washington State taxpayers, and U.S. taxpayers more broadly, if the corporations profiting from the Gateway terminal do not pay for the full costs of clean up and restoration of a marine oil/coal spill and the jobs lossed as a result.

The significance of a marine oil/coal spill resulting from the additional transits of coal tankers made possible by the Gateway terminal is clear. It is also clear that the impact would be permanent and the harm irreparable.

The legal standard for a Major Project Permit is that the project will "not impose uncompensated requirements for public expenditures for additional utilities, facilities, and services, and will not impose uncompensated costs on other property owned."

Scoping needs to include an examination of such uncompensated public expenditures that would be needed for cleanup/recovery following an oil/coal spill in the Salish Sea involving coal tankers. For example, would taxpayers have to pay for the positioning of clean up barges and other facilities on an ongoing basis to prepare for the likelihood of such a spill.

The scoping should also look at the likelihood of marine accidents and adverse/irreparable impacts as future growth occurs, leading to more shipping through these waters.

It is difficult to determine how to mitigate the adverse consequences of a marine accident leading to an oil/coal spill. No action may be the only course.

A separate study should be conducted on the impact of the Gateway project on tourism in the San Juan's and elsewhere in the Salish Sea. A marine accident and oil/coal spill would be likely to reduce tourism in the San Juan's and cost substantial numbers of jobs on my island, Orcas, as well as San Juan, Shaw, Lopez and other islands.

Many of the job losses would occur in lodging, restaurants, and local tourist attractions. The San Juan's have attracted up to 1.6 million visitors each year and they generate about $117 million per year in San Juan County (Gillespie, p. 13). The San Juan's regularly appear on various Top Ten places to visit in the U.S. and even the entire world.

The jobs that this generates come in part from high-value eco-tourism such as whale-watching and bird-watching. Tourism and the outdoor industry brings a value of $8.5 billion per year to Washington State, buttressed by 115,000 dependent jobs (Gillespie, p. 13).

The scoping should examine what the impact of the Gateway Project would be on tourism in Washington State, including the significant and likely adverse impacts occurring from oil/coal spills on unique species, such as Orca whales.